

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRIAN KEMP, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**COALITION PLAINTIFFS' NOTICE OF FILING
CURRICULUM VITAE**

Coalition Plaintiffs file herewith the curriculum vitae of Susan Greenhalgh, attached as Exhibit 1, and Rhonda J. Martin, attached as Exhibit 2.

This 8th day of September, 2020.

/s/ Bruce P. Brown
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Counsel for Coalition for Good Governance

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

**v.
E**

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF SERVICE AND COMPLIANCE

I hereby certify that on September 8, 2020, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record. In addition, pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Bruce P. Brown
Bruce P. Brown

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Susan Greenhalgh, Senior Advisor on Election Security Free Speech For People

Susan Greenhalgh has been a force in the election integrity movement since 2004. Nationally, Susan's earlier focus was to change the perception of electronic voting systems and bring the problems and failures of electronic voting to the mainstream media, most notably pitching the story ideas which became the "Democracy at Risk" series on CNN's "Lou Dobbs Tonight" resulting in over 70 segments and a one hour special. Susan continued to increase national attention for election integrity for VoteTrustUSA, VoterAction.org, CommonCause and others, successfully pitching interviews and stories to leading national media outlets generating coverage at *CBS News, Fox News, MSNBC, CNBC, NPR, The New York Times, The Washington Post, USA Today, The Wall Street Journal, The Associated Press, Reuters, McClatchy* and many more major news outlets.

Susan has been promoting paper ballots and audits at the national and state level with a focus on framing election security as a national cyber security issue well before the 2016 election concerns. She has been invited to testify before the U.S. Commission on Civil Rights, and has been an invited speaker at meetings of the MITRE Corporation, the National Conference of State Legislatures, the Mid-West Election Officials Conference, the International Association of Government Officials, the Election Verification Network and the E-Vote-ID conference in Bregenz, Austria.

Susan led an aggressive program to fight the expansion of unverifiable and unauditible Internet voting in the U.S. She fought new legislation for Internet voting proposed in Pennsylvania, Washington, New Jersey, Virginia, New York, California and Minnesota and, working cooperatively with our state partner groups and successfully opposed them.

In the last year Susan has been a leading agent pressing for the U.S. to adopt auditable voting systems across the country in response to the attacks on the 2016 election. She identified the possible connection between the cyber attack on a voting system vendor documented in a leaked NSA, which was reported in a front page story in *The New York Times*. Susan has been invited to privately brief congressional committee staff on voting system security and has also participated in formal congressional briefings. She has provided guidance to congressional efforts to address election security, most notably suggesting the voting system vendors submit their systems to national laboratories which spurred the current program at the Idaho National labs. She is a frequent source for reporters from *The New York Times, The Wall Street Journal, USA Today, Associated Press, National Public Radio* and other leading news outlets. She has appeared on CNN and MSNBC's *The Rachel Maddow Show*. She has a BA in Chemistry from the University of Vermont.

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Rhonda J. Martin

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Rhonda (Ronnie) Martin is executive secretary for the Qatar Computing Research Institute (QCRI) Scientific Advisory Committee. Previously, she was strategic program coordinator for the QCRI Strategic Advisory Council. She is well known for her leadership of R&D organizations as well for her work in software engineering. She is co-author of the book, *Software Test and Evaluation*, which was inspired by her work in developing US Department of Defense (DoD) Policy for software testing for mission-critical systems. She has been a frequent speaker at academic and industry forums and conducted software testing seminars throughout the United States, Canada, and Europe. From 1987 to 1994, she was research coordinator for the National Science Foundation Software Engineering Research Center (SERC), a national consortium of universities and industrial members. She managed the research program and coordinated all governance activities for NSF, seven universities, and thirty leading industrial and government software development organizations. SERC was widely considered to be among the most successful university-based industrial software engineering research consortia.

She is best known for her ability to apply technical knowledge and management skills to form and successfully lead interdisciplinary teams in industry, government, and academia. She was a member of the Mothra Software Testing Environment research team, at Georgia Institute of Technology and at Purdue University. She helped lead the team that produced one of the first large-scale mutation-based software testing tools for Defense applications. Prior to joining Purdue, she was Manager of the Software Test and Evaluation Project (STEP) at Georgia Institute of Technology. STEP consolidated DoD-wide resources for software test and evaluation and developed new DoD guidance and policy for the testing of computer software for mission-critical applications. Among STEP's major achievements was to successfully coordinate the evaluation of tests for the Patriot Air Defense System. She joined the research staff at Georgia Tech from Control Data Corporation, where she was Project Manager for earlier phases of STEP and oversaw extensive data gathering and analysis activities.

Prior to joining Control Data, Ronnie was a software engineer with IBM Corporation where she developed avionics software for the Space Shuttle.

She was a frequent participant in Institute for Defense Analyses studies of DoD-related software technology and directed a National Security Industrial Association Task Force that investigated problems associated with the software crisis faced by the DoD.

In the non-profit world, Ronnie was a member of the leadership team of ARCS® Foundation from 2005 to 2017. ARCS Foundation is a U.S.-wide network of fifteen local chapters that

advances science and technology in the United States by providing financial awards to academically outstanding U.S. citizens studying to complete advanced degrees in science, engineering, and medical research. She has managed communications, overseen the development of IT infrastructure, edited the foundation's national newsletter, and has served on the National Board of Directors. She was most recently Chair, Internal Communications, for its Atlanta Chapter.

Ronnie earned an M.S. in Operations Research and a B.S. in Applied Mathematics from Georgia Tech and received her Certification with a Math Education Major/Science Education Minor from Purdue University. She taught mathematics at Kent Place School in Summit, New Jersey.

Curriculum Vita

Present Position

- *Executive Secretary, Qatar Computing Research Institute Scientific Advisory Committee*
- *Board of Directors, Coalition for Good Governance*

Education

- Certification, Math Education Major/Science Education Minor, 1995, Purdue University, West Lafayette, Indiana
- MS, Operation Research, 1985, Georgia Institute of Technology, Atlanta, Georgia
- BS, Applied Mathematics, 1977, Georgia Institute of Technology, Atlanta, Georgia

Professional Experience

2005-2017	ARCS Foundation Board ARCS Foundation, Atlanta Chapter Atlanta, Georgia
2011-2014	Strategic Program Coordinator QCRI Strategic Advisory Council Qatar Computing Research Institute Doha, Qatar
1987-1995	Research Coordinator and Sr. Software Engineer Software Engineering Research Center Department of Computer Science Purdue University West Lafayette, Indiana

1986	Instructor, Software Testing Seminars Hazeltine Corporation Long Island, New York
1985-1988	Instructor, Software Testing Seminars Technology Training Corporation Torrance, California
1983-1987	Research Scientist and Project Manager Software Engineering Research Center Georgia Institute of Technology Atlanta, Georgia
1981-1983	Research Scientist Control Data Corporation Atlanta, Georgia
1977-1981	Programmer IBM Atlanta, Georgia and Houston, Texas

Professional Leadership

2011-2012	Director, ARCS Foundation Website Training Task Force
1982-1990	Director, National Security Industrial Association Software Task Force

Major Studies Authored

1986-1987	International Test and Evaluation Association Test and Evaluation of Command and Control Systems Developed by Evolutionary Acquisition Study
1985-1986	National Security Industrial Association C ³ I Software Status Reporting Study
1982-1983	National Security Industrial Association Command and Control Software Development and Acquisition Study

Committees

1984-1993	Ada Programming Support Environment Evaluation and Validation Tri-Service Team
1983-1986	Software Technology for Adaptable Reliable Systems

Program's Joint Service Software Engineering Environment Team

1983-1985 Director Defense Test and Evaluation Research Initiatives Roundtable

Publications

Books

- R. A. DeMillo, W. M. McCracken, R. J. Martin, J. F. Passafiume, *Software Testing and Evaluation*, The Benjamin-Cummings Publishing Company, Inc. 1986.

Papers/Technical Reports

1. R. A. DeMillo and R. J. Martin, "Software Test and Evaluation Project: A Status Report", *NSIA National Conference on Software Test and Evaluation*, February 1-3, 1983, Washington, DC, pp. T1-T10
2. R. A. DeMillo and R. J. Martin, "Volume 1 - Report and Recommendations" OSD/DDT&E Software Test and Evaluation Project, Phases I and II, Final Report, submitted to the Office of the Secretary of Defense, Director Defense Test and Evaluation and the Office of Naval Research ONR Contract Number N00014-79-C-0231, June 1983
3. R. J. Martin, "NSIA C² Software Development and Acquisition Study, Briefing Book", prepared for the United States Air Force Electronic Systems Division, August 1983
4. R. A. DeMillo, R. A. Gagliano, R. J. Martin, and J. F. Passafiume, "Policy Recommendations for Software Test and Evaluation: System Level Test Issues", *Journal of Test and Evaluation*, January 1984, Vol. V, No. 1, pp 21-28
5. S. T. Redwine, Jr., L. G. Becker, A. B. Marmor-Squires, R. J. Martin, S. H. Nash, and W. E. Riddle, "Department of Defense Related Software Technology Requirements, Practices, and Prospects for the Future", Institute for Defense Analyses Paper P-1788, prepared for the Office of the Under Secretary of Defense for Research and Engineering, June 1984
6. R. J. Martin and W. M. McCracken, "Evolutionary Testing of C² Systems", *Proceedings of the AIAA/ACM/NASA/IEEE Computers in Aerospace V Conference*, October 1985
7. J. H. Balsam and R. J. Martin, "Software Test and Evaluation Management Plan", February 1986
8. J. H. Balsam and R. J. Martin, "Test and Evaluation Master Plan for the Software Technology for Adaptable Reliable Systems Software Engineering Environment", May 1986
9. J. H. Balsam and R. J. Martin, "DoD-STD-2167 Test Requirements for the Software Technology for Adaptable Reliable Systems Software Engineering Environment", July 1986
10. C. J. Linn, S. T. Redwine, Jr., M. I. Bloom, B. Brykczynski, J. Chludzinski, J. Grover, D. Heystek, M. R. Kappel, J. M. Lake, R. J. Martin, S. H. Nash, and J. Salasin, "SDI Software

Technology Program Plan”, Institute for Defense Analyses Paper P-1926, prepared for the Strategic Defense Initiative Organization, June 1987

11. R. J. Martin, “C² Software Development and Acquisition Study Final Report”, prepared by the National Security Industrial Association Software Task Force for Air Force Electronic Systems Division, July 1987
12. R. J. Martin, “Ada Market Analysis, 1988-1992”, September 1987
13. R. J. Martin and S. M. Thebaut, “SERC Project Architecture”, Software Engineering Research Center Research Report SERC-TR-12-P, Purdue University, March 1988
14. R. A. DeMillo, R. J. Martin, and R. N. Meeson, “Strategy for Achieving Ada-Based High Assurance Systems”, Institute for Defense Analyses Paper P-2143, prepared for Ada Joint Program Office, Rome Air Development Center, December 1988
15. B. Choi, R. A. DeMillo, E. W. Krauser, R. J. Martin, A. P. Mathur, A. J. Offutt, E. H. Spafford, "The Mothra Toolset," *Proceedings 22nd HICSS*, January 1989
16. R. J. Martin, “Using the Mothra Software Testing Environment to Ensure Software Quality”, *Proceedings IEEE National Aerospace & Electronic Conference (NAECON) '89*, May 1989
17. H. Agrawal, R. A. DeMillo, R. Hathaway, E. W. Krauser, R. J. Martin, and A. P. Mathur, “The Design of Mutation Operators for C”, Software Engineering Research Center Research Report SERC-TR-41-P, Purdue University, March 1989
18. R. J. Martin and A. P. Mathur, “Software and Hardware Quality Assurance: Towards a Common Platform for High Reliability”, Software Engineering Research Center Research Report SERC-TR-53-P, Purdue University, September 1989
19. R. J. Martin, “A Study Report on Streamlining Software Development Documentation for Air Force C³ Systems” prepared by the National Security Industrial Association Air Force C3I Subcommittee – Software Task Force, March 1990
20. R. J. Martin and S. M. Thebaut, “SERC Affiliate Current Practices”, Software Engineering Research Center Research Report SERC-TR-32-P, Purdue University, May 1990
21. R. J. Martin, D. J. Might, E. T. Wainwright, “Website Training Task Force Final Report”, prepared for ARCS Foundation, Inc., Washington, D.C., May 2012

Seminars

1. R. J. Martin and W. M. McCracken, “Software Testing”, Technology Training Corporation, Washington, D.C., 15-16 July 1985
2. R. J. Martin and W. M. McCracken, “Software Testing”, Technology Training Corporation, Orlando, Florida, 22-23 July 1985
3. R. J. Martin and W. M. McCracken, “Software Testing”, Technology Training Corporation, Boston, Massachusetts, 29-30 July 1985
4. R. J. Martin and W. M. McCracken, “Software Testing”, Technology Training Corporation, San Jose, California, 07-08 November 1985

5. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Los Angeles, California, 14-15 November 1985
6. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Toronto, Canada, 23-24 February 1986
7. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Montreal, Canada, 26-27 February 1986
8. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Munich, Germany, 17-18 April 1986
9. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Paris, France, 21-22 April 1986
10. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, London, England, 24-25 April 1986
11. R. J. Martin and W. M. McCracken, "Software Testing", Hazeltine Corporation, Long Island, New York, 19-20 June 1986
12. R. J. Martin and W. M. McCracken, "Software Testing", Hazeltine Corporation, Long Island, New York, 18-19 September 1986
13. R. J. Martin and W. M. McCracken, "Software Testing", Hazeltine Corporation, Long Island, New York, 03 November 1986
14. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Newport Beach, California, 13-14 July 1987
15. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, San Diego, California, 16-17 July 1987
16. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Sunnyvale, California, 10-11 August 1987
17. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Los Angeles, California, 13-14 August 1987
18. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Peterson Air Force Base, Colorado, 28-29 September 1987
19. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Montreal, Canada, 07-08 December 1987
20. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Toronto, Canada, 10-11 December 1987
21. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Montreal, Canada, 12-14 September 1988
22. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Ottawa, Canada, 19-21 September 1988
23. R. J. Martin and W. M. McCracken, "Software Testing", Technology Training Corporation, Toronto, Canada, 26-28 September 1988

Presentations

1. R. J. Martin and E. C. Bauder, “C² Software Development and Acquisitions Study”, Final Briefing to Lt. Gen. James W. Stansberry, Commander, Air Force Electronic Systems Division, Hanscom Air Force Base, Massachusetts, 03 August 1983
2. R. A. DeMillo and R. J. Martin, “Software Test and Evaluation Project”, 14th Multi-Service Development Test and Evaluation Commanders Conference, Newport, Rhode Island, 23-24 August 1983
3. R. J. Martin, “Software Test and Evaluation Project”, Joint Services Software Engineering Environment Team Meeting, Washington, D.C., 12-13 October 1983
4. R. J. Martin, “Software Test and Evaluation Project”, International Test and Evaluation Association/Tidewater Chapter Meeting, Norfolk, Virginia, 18 October 1983
5. R. J. Martin, “C² Software Development and Acquisitions Study”, AIAA Computers in Aerospace IV, Hartford, Connecticut, 24-26 October 1983
6. R. J. Martin, “C² Software Development and Acquisitions Study”, AFCEA Evolutionary Development of Command and Control Software Military and Commercial Symposium and Exhibition, Kansas City, Missouri, 27-28 October 1983
7. R. J. Martin and E. C. Bauder, “C² Software Development and Acquisitions Study”, Briefing to MITRE Personnel, Boston, Massachusetts, 01 December 1983
8. R. J. Martin, “C² Software Development and Acquisitions Study”, NSIA Software Committee Membership Meeting, Crystal City, Virginia, 14 December 1983
9. R. J. Martin, “The Software Test and Evaluation Project – Progress and Plans”, NSIA Software Committee Membership Meeting, Crystal City, Virginia, 14 December 1983
10. R. J. Martin, “The Software Test and Evaluation Project – Progress and Plans”, APSE Evaluation and Validation Team Meeting, Dayton, Ohio, 07 March 1984
11. R. J. Martin and W. M. McCracken, “The Software Test and Evaluation Project – Progress and Plans”, 16th Multi-Service Development Test and Evaluation Commanders Conference, Camp Pendleton, California, 19 September 1984
12. R. J. Martin, “C² Software Development and Acquisitions Study”, Meeting of Selected OSD/C3I Personnel, Washington, D.C., 29 November 1984
13. R. J. Martin, “The Software Test and Evaluation Project – Progress and Plans”, NSIA STARS Conference, San Diego, California, 02 May 1985
14. R. J. Martin, “The Software Test and Evaluation Project, Overview and Status Report”, Briefing to Dr. Joseph Navarro, Deputy Under Secretary of Defense for Test and Evaluation (DUSDRE(T&E)), Washington, D.C., 26 February 1986
15. R. J. Martin, “C² Software Development and Acquisitions Study”, ITEA/AFCEA Test and Evaluation of C² Systems Developed by Evolutionary Acquisition Study Meeting, Washington, D.C., 23 September 1986
16. R. J. Martin, D. J. Might, E. T. Wainwright, “ARCS Foundation Website 101”, ARCS Foundation National Annual Meeting, Denver, Colorado, 31 May 2012

17. R. J. Martin, D. J. Might, E. T. Wainwright, L. M. Workman, "Improving Chapter Management and Effectiveness", ARCS Foundation National Annual Meeting, Honolulu, Hawaii, 30 May 2013
18. R. J. Martin, D. J. Might, E. T. Wainwright, "Improving Chapter Effectiveness and Efficiency", ARCS Foundation National Annual Meeting, Salt Lake City, Utah, 18 September 2014

Workshops/Symposiums

1. Joint Logistics Commanders" Workshop on Post Deployment Software Support for Mission Critical Computer Software, Orlando, Florida, 31 October – 04 November 1983
2. Ada Programming Support Environment Evaluation and Validation Workshop, Airlie, Virginia, 02-06 April 1984
3. Software Technology for Adaptable Reliable Systems Program Measurement Data Item Descriptions Review and Workshop, Software Test Session Leader, Rome, New York, 14-15 August 1984
4. ACM/AdaTEC Future Ada Environment Workshop, Santa Barbara, California, 17-20 September 1984
5. Joint Service Software Engineering Environment Operational Concept Document Workshop, Virginia Beach, Virginia, 14-16 May 1985
6. Air Force Operational Test and Evaluation Center Software Test and Evaluation Workshop, Kirtland Air Force Base, New Mexico, 11-12 June 1985
7. Air Force Electronic Systems Division/MITRE Software Acquisition Symposium, Boston, Massachusetts, 06-07 May 1986
8. National Bureau of Standards Software Acceptance Test Workshop, Gaithersburg, Maryland, 01-02 April 1986
9. ACM/IEEE Workshop on Software Testing, Banff, Alberta, Canada, 16-17 July 1986